

UNITED STATES DISTRICT COURT

WESTERN

DISTRICT OF

OKLAHOMA

RUSS and NATALIE GODFREY

JOINT
EXHIBIT AND WITNESS LIST

V.

CSAA FIRE & CASUALTY INS. CO.

Case Number: 5:19-cv-329-JD

PRESIDING JUDGE Judge Jodi W. Dishman					PLAINTIFF'S ATTORNEY Mark Engel/Keith Givens	DEFENDANT'S ATTORNEY Gerard Pignato
TRIAL DATE (S) 03/09/2020					COURT REPORTER	COURTROOM DEPUTY Nyssa
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1					Certified copy of insurance policy issued to Plaintiffs, including declarations pages and all endorsements. (CSAA_GODFREY 00001-00004, 00567-00780)	
2					CSAA claim notes. (CSAA_GODFREY 00536-00566)	
3					Letter from Sayde Brooks (CSAA) to Russ Godfrey. (CSAA_GODFREY 00005-00012)	
4					US Adjusting "sketches" of Godfrey roof. (CSAA_GODFREY 00034-00036)	
5					Photos taken by Michael White during inspection. (CSAA_GODFREY 00053-00115)	
6					Michael White (US Adjusting Services) Estimate (inspected on 02/28/18). (CSAA_GODFREY 00037-00042, 00118-00128)	
7					Michael White (US Adjusting Services) Estimate-Components (inspected on 02/28/18). (CSAA_GODFREY 00129-00132)	
8					Price Variation Usage Report-US Adjusting Services, Statement of Loss-US Adjusting Services, US Adjusting Services invoice (\$412). (CSAA_GODFREY 00133-00135)	
9					Loss Report-US Adjusting Services dated 03/02/18. (CSAA_GODFREY 00199-00200)	
10					Michael White (US Adjusting Services) Estimate (inspected on 02/28/18). (CSAA_GODFREY 00231-00241)	
11					Loss Report-US Adjusting Services dated 03/03/18. (CSAA_GODFREY 00311-00312)	
12					Statement of Loss-US Adjusting Services. (CSAA_GODFREY 00313-00322, 00386-00387)	
13					Mark Costello estimate for CSAA, Price Variation Usage Report-CSAA, Mark Costello sketches for estimate. (CSAA_GODFREY 00451-00466)	
14					Mark Costello Estimate Audit Trail and Mark Costello Estimate-Components. (CSAA_GODFREY 00467-00476, 00477-00486)	
15					Letter from Sayde Brooks (CSAA) to Russ Godfrey. (CSAA_GODFREY 00489-00490)	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

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16					Letter from Sayde Brooks (CSAA) to Russ Godfrey. (CSAA_GODFREY 00491-00502)	
17					Email from Allen Lippoldt (Ultimate Roofing) to Sayde Brooks (CSAA). (CSAA_GODFREY 00508)	
18					Email from Allen Lippoldt (Ultimate Roofing) to Sayde Brooks (CSAA) and photos. (CSAA_GODFREY 00509-00522)	
19					Email from Sayde Brooks (CSAA) to Allen Lippoldt (Ultimate Roofing). (CSAA_GODFREY 00523-00524)	
1					Russ Godfrey (Deposed)-Ps: Purchase of insurance; ice damage to roof, interior leaks, cost of repair, denial of claim, unreasonableness of denial and underpayment, representations of Defendant's adjusters. D: All relevant issues, insurance policies issued on subject property, investigation and handling of subject claims, prior claims and lawsuits.	
2					Natalie Godfrey (Deposed)-Ps: Purchase of insurance, ice damage to roof, interior leaks, cost of repair, denial of claim, unreasonableness of denial and underpayment, representations of Defendant's adjuster. D: All relevant issues, insurance policies issued on subject property, investigation and handling of subject claims.	
3					Sayde Brooks (Deposed)-Ps: Inspections and estimates performed at Defendant's request; guidelines, rules and restrictions applicable to work performed at Defendant's request; revenue sought or received from work performed at Defendant's request; nature, cause and extent of damages sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs' home; contacts with Defendant and/or individuals associated with Defendant; issues raised by Defendant.	

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					D: Investigation and handling of Plaintiffs' claim.	
4					Mark Costello (Deposed)-Ps: Inspections and estimates performed at Defendant's request; guidelines, rules and restrictions applicable to work performed at Defendant's request; revenue sought or received from work performed at Defendant's request; nature, cause and extent of damages sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs' home; contacts with Defendant and/or individuals associated with Defendant; issues raised by Defendant. D: Investigation and handling of Plaintiffs' claim.	
5					Alana Hare (Deposed)-Ps: Inspections and estimates performed at Defendant's request; guidelines, rules and restrictions applicable to work performed at Defendant's request; revenue sought or received from work performed at Defendant's request; nature, cause and extent of damages sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs' home; contacts with Defendant and/or individuals associated with Defendant; issues raised by Defendant. D: Investigation and handling of Plaintiffs' claim; CSAA's claim handling policies and procedures.	
6					Michael White-Ps: Inspections and estimates performed at Defendant's request; guidelines, rules and restrictions applicable to work performed at Defendant's request; revenue sought or received from work performed at Defendant's request; nature, cause and extent of damages sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs' home; contacts with Defendant and/or individuals associated with Defendant; issues raised by Defendant. D: Inspections and estimates performed; method of compensation; discussion of what an independent adjuster does.	

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